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SOAH DOCKET NO. 473-21-0538

PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR  
AUTHORITY TO CHANGE RATES

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BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY REGULATION  
ADMINISTRATIVE HEARINGS

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
TWELFTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

Cities Advocating Reasonable Deregulation's ("CARD") Twelfth Set of Requests for Information ("RFIs") to Southwestern Electric Power Company ("SWEPCO") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) calendar days of service hereof or no later than **March 30, 2021**, or as modified by Order. Exhibit A is attached hereto and incorporated herein for all purposes.

**DEFINITIONS**

1. "SWEPCO," the "Company," and "Applicant" refer to Southwestern Electric Power Company and its affiliates.
2. "You," "yours," and "your" refer to SWEPCO (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SWEPCO.

5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SWEPCO or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

### **INSTRUCTIONS**

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SWEPCO considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SWEPCO objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SWEPCO receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

**HERRERA LAW & ASSOCIATES, PLLC**

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**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of March, 2021, a true and correct copy of CARD's *Twelfth Set of Requests for Information to SWEPCO* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey

Leslie Lindsey

**EXHIBIT A**

**SOAH DOCKET NO. 473-21-0538  
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
ELECTRIC POWER COMPANY FOR § OF  
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**CITIES ADVOCATING REASONABLE DEREGULATION'S  
TWELFTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN ELECTRIC POWER COMPANY**

- 12-1.** Please provide the total distribution capital investment placed in service since SWEPCO's last base rate case (Docket 46449) that has not been previously reviewed and approved by the Commission, and which is being requested in rates in this case.
- 12-2.** Please provide the total transmission capital investment placed in service since SWEPCO's last base rate case (Docket 46449) that has not been previously reviewed and approved by the Commission, and which is being requested in rates in this case.
- 12-3.** Please provide all changes in the planned retirement dates of SWEPCO generating units reflected in witness McMahon's direct testimony Table 2, which have occurred since the testimony was filed.
- 12-4.** Reference the response to CARD 1-8, please provide the retail class allocation factors used for allocating operating reserve purchase costs to each Texas retail class under the Cajun agreement and identify the basis for the allocation (e.g., demand, energy or another basis).
- 12-5.** Reference the response to CARD 2-24, please clarify whether the data provided includes or excludes major storm events.
- 12-6.** Reference the response to CARD 2-25, please provide the distribution line miles for SWEPCO's Texas service area and for each SWEPCO affiliate listed.
- 12-7.** Reference the response to CARD 7-2, please provide the study date, natural gas price forecast, and replacement capacity costs (if any) used for each referenced study.
- 12-8.** Reference the response to CARD 7-3, please provide the study date, natural gas price forecast, and replacement capacity costs (if any) used for each referenced study.
- 12-9.** Reference the response to CARD 7-6, please provide the basis for the forecasted market capacity prices and provide the equivalent annual capacity price (\$/kW-year) for each year of the forecast.
- 12-10.** Please provide the bid price results, and volume of capacity offered, for the most recent RFPs for short-term capacity issued by SWEPCO or PSO.

- 12-11.** Reference the responses to CARD 7-2, CARD 7-16 and CARD 7-18, please provide the results of any scenarios evaluated by SWEPCO that considered retirement of Pirkey earlier than 2023 with replacement of any capacity deficit caused by the earlier retirement with short-term capacity purchases. If no such scenarios were evaluated, please explain why not.
- 12-12.** Reference the responses to CARD 7-19, and Schedule H 5.3b, please identify any capital projects that were re-evaluated or cancelled due to the Company's decisions to retire Dolet Hills and Pirkey earlier than originally planned.
- 12-13.** Reference Schedule H 5.3b, please provide documentation of the scope and justification for the capital spending for the project at Dolet Hills designated as WSX111023, Dolet Hills Pbp Other Production and provide the total amount of capital spending requested in rate base in this case that has not been previously approved by the Commission and included in rate base.
- 12-14.** Reference the responses to CARD 7-24 and CARD 7-25, please reconcile the responses that all SPP ancillary service costs and revenues during the test year are recovered via base rates with the Company's fuel reconciliation application in PUC Docket No. 50994, which requests that costs and revenues associated with operating reserves, regulation services and other such SPP market services as reconcilable expenses recoverable through the Company's fuel factor.
- 12-15.** Please explain and provide justification for the Company's request for recovery of coal inventory for Dolet Hills when the operations of the plant is restricted primarily to summer months and the plant is expected to be retired by the end of 2021.
- 12-16.** Please provide any adjustments made to SWEPCO's coal and lignite inventory targets to reflect the reduction in energy production from such plants experienced over the last several years and/or forecasted over the next several years.